



Department of Energy
National Nuclear Security Administration
Nevada Site Office
P.O. Box 98518
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FEB 08 2006

Thomas P. D'Agostino, Acting Deputy Administrator for Defense Programs, NNSA/HQ
(NA-10) FORS

**FEEDBACK AND IMPROVEMENT (F&I) ASSESSMENTS AND SITE ACTION PLAN
(SAPs) FOR DEFENSE NUCLEAR FACILITIES SAFETY BOARD (DNFSB)
RECOMMENDATION 2004-1 COMMITMENT 25**

Your memorandum dated November 14, 2005.

The DNFSB issued Recommendation 2004-1, Oversight of Complex, High-Hazard Nuclear Operations, on May 21, 2004. The Department accepted the Board's recommendation on July 21, 2004, and developed its statutorily-required Implementation Plan in response to the Board's recommendation. In your November 14, 2005, memorandum you requested that each Site Office conduct or utilize previous F&I assessments and develop SAPs.

Enclosed are the NNSA Nevada Site Office (NNSA/NSO) F&I assessment and SAP. Many of the findings identified in the SAP were previously identified in an NNSA/NSO Management Self-Assessment and the Chief Defense Nuclear Safety review of nuclear operations and activities at the Nevada Test Site. A formal corrective action plan has been developed and approved by this office.

If you have any questions, please feel free to contact me at (702) 295-3211 or my point of contact, Michael A. Marelli, at (702) 295-0991.

Kathleen A. Carlson
Manager

O/AMSP:KAH-6134
AOM 04-01

Enclosures:
As stated

cc w/encls:
F. B. Russo, NNSA/HQ (NA-1) FORS
C. R. Sykes, NNSA/HQ (NA-124) GTN

Enclosure 1

NNSA/NSO DNFSB 2004-1 Commitment 25 NSO Site Action Plan

No.	Issue (CRAD Area)	Issue Category	Issue Statement	Contractor or Office Assigned	Lead for Corrective Action	Closure Due Date	caWeb Ref. #	Actions to Remedy the finding
1		F	DOE O 226.1, Attachment 2, Section 2.e. requires that personnel who manage and perform assurance functions must possess experience, knowledge, skills, and abilities commensurate with their responsibilities. Although this requirement is implemented in performance documents (<i>refer to CRADs F&FI-1/6 and F&FI-2-2.4/6</i>), PD-3200.004 does not contain a specific discussion of how BN meets this requirement.	BN	Contractor Assurance & Compliance (Barbero)	7/31/2006	9645	The identified weaknesses only exist as deficient narratives in the BN CAS Program Description Document. As the actual CAS processes referenced are fully implemented in BN performance documents and work instructions and have been applied in the field, BN's planned corrective action for the issue is restricted to enhancing the narrative in the CAS Program Description Document to more adequately address the three areas. This change is scheduled to be completed and submitted for approval within 90 days following the incorporation of DOE O 226.1 into the Prime Contract or by July 31, 2006, whichever occurs first.

NNSA/NSO DNFSB 2004-1 Commitment 25 NSO Site Action Plan

No.	Issue (CRAD Area)	Issue Category	Issue Statement	Contractor or Office Assigned	Lead for Corrective Action	Closure Due Date	caWeb Ref. #	Actions to Remedy the finding
2		F	DOE O 226.1, Attachment 2, Section 1 requires the contractor to flow down the requirements of the CRD to subcontractors to the extent necessary to ensure the subcontractors compliance with requirements. Although this requirement is implemented in performance documents (<i>refer to CRAD F&FI-1/3</i>), PD-3200.004 does not contain a specific discussion of how BN meets this requirement.	BN	Contractor Assurance & Compliance (Barbero)	7/31/2006	9645	See item 1
3		F	DOE O 226.1, Attachment 2, Appendix A, Section 4 requires the implementation of processes to solicit feedback from workers and activities. Although this requirement is implemented in performance documents (<i>refer to CRADs F&FI-2-2.2/4</i>), PD-3200.004 does not contain a specific discussion of how BN meets this requirement.	BN	Contractor Assurance & Compliance (Barbero)	7/31/2006	9645	See item 1
4	F&I-3 Criteria 1	F	NSO has not scheduled and executed functional assessments in accordance with NSO M 220.XC, <i>NNSA/NSO Oversight Management System</i> , dated 12-16-03.	NSO	MSSP Brock	6/30/06		NSO will develop an integrated assessment schedule. MSSP conducts oversight of the schedule on a monthly basis.
5	F&I-3 Criteria 3,7,8	OFI	To institutionalize BN's Contractor Assurance System, NSO should capture the process within the NSO directives and include a provision for NSO personnel to negotiate and validate the performance metrics.	NSO	AMSP Hoar	9/30/06		NSO develops BCR and Format 1 for DOE O 226.1 Implementation. Presents to Contract Review Group for incorporation into Work Smart Standards.

NNSA/NSO DNFSB 2004-1 Commitment 25 NSO Site Action Plan

No.	Issue (CRAD Area)	Issue Category	Issue Statement	Contractor or Office Assigned	Lead for Corrective Action	Closure Due Date	caWeb Ref. #	Actions to Remedy the finding
6	F&I-3 Criteria 3	OFI	The Quarterly Performance Indicator could be greatly enhanced by including accomplishments of Facility Representatives having a positive influence on operations.	NSO	AMSO Seaborg	9/30/06		AMSO will evaluate its quarterly report and modify report to positively communicate positive influences by the Facility Representatives.
7	F&I-3 Criteria 4	F	NSO issues are not always effectively tracked and managed utilizing the site's issue management database (caWeb).	NSO	MSSP Brock (All AM's)	9/30/06		NSO will revise its NSO M 220.XC, <i>NNSA/NSO Oversight Management System</i> to include a process for the Management System Steering Panel to track and monitor caWeb issues.
8	F&I-3 Criteria 4	F	caWeb is not being appropriately implemented for NSO quality assurance issues.	NSO	AMSP Sanchez AMNS Parker	9/30/06		NSO management will make a more concerted effort to ensure all assessment findings are placed into caWeb.
9	F&I-3 Criteria 4	OFI	NSO/BN should consider an assessment on the caWeb system to determine if improvements to root cause identification can be made to better determine root causes.	NSO	AMSP Sanchez Marelli	8/30/06		NSO will conduct an assessment to determine if the issues management system can be improved for root cause identification.
10	F&I-3 Criteria 5	OFI	NSO does not have a program for dissenting opinions.	NSO	AMSP Brock	12/31/06		NSO will develop a NV Order for dissenting opinions.
11	F&I-3 Criteria 5	OFI	NSO has not assessed the effectiveness of the contractors/NSO issues management system, lessons learned program, and contractor assurance systems for WSI, SNJV, LANL, LLNL, and SNL.	NSO	AMSP Hoar	12/31/06		Conduct assessment of the effectiveness of caWeb. Secondly, conduct an assessment using Commitment 25 approved CRADs for WSI, SNJV, and the National Laboratories.

NNSA/NSO DNFSB 2004-1 Commitment 25 NSO Site Action Plan

No.	Issue (CRAD Area)	Issue Category	Issue Statement	Contractor or Office Assigned	Lead for Corrective Action	Closure Due Date	caWeb Ref. #	Actions to Remedy the finding
12	F&I-3 Criteria 5	F	NSO has not assessed the effectiveness of the contractors/NSO issues management system.	NSO	AMSP Hoar	9/30/06		NSO will conduct an assessment of the issues management system for BN & NSO.
13	F&I-3 Criteria 5	F	NSO has not assessed the effectiveness of the contractor's lessons learned program and other feedback mechanisms.	NSO	AMSP Niemann	2/28/06		NSO will conduct an assessment of BN's Lessons Learned and Feedback and Improvement programs.
14	F&I-3 Criteria 8	F	Several key NSO positions have not been placed under the Technical Qualification Program (TQP) per DOE M 426.1-1A, <i>Federal Technical Capability Program Manual</i> .	NSO	FTCP- Mellington (All AM's)	6/30/06		NSO FTCP conducts an independent assessment of TQP utilizing the LSO FTCP. NSO FTCP validates that each individual has been placed in the TQP and this requirement is contained in their workplans.
15	F&I-3 Criteria 8	F	NSO has not developed a qualification package for the NSO Criticality Safety Functional Area Lead.	NSO	AMSP Hoar	6/30/06		NSO will hire a Crit Safety professional within the next five months (6/30/06). Once this individual begins employment, a qualification package will be developed within 120 days.
16	F&I-3 Criteria 8	F	Safety basis review engineers and quality assurance professionals have not completed requirements for technical qualifications.	NSO	AMSP Niemann	6/30/06		NSO management has put this requirement into each of the safety basis and quality assurance professionals work plans. The plans will be monitored in April and necessary travel and training monies set aside for this training.

NNSA/NSO DNFSB 2004-1 Commitment 25 NSO Site Action Plan

No.	Issue (CRAD Area)	Issue Category	Issue Statement	Contractor or Office Assigned	Lead for Corrective Action	Closure Due Date	caWeb Ref. #	Actions to Remedy the finding
17	F&I-3 Criteria 8	F	Although the current staffing may be adequate to perform the readiness role that NSO has taken on, a full implementation of oversight of the startup and restart of nuclear operations would appear to require the qualification and availability of other site personnel.	NSO	Exec. Council – Hunemuller	9/30/06		NSO Executive Council reviews and determines which NSO staff needs to meet this requirement. NSO Executive Council dedicates travel/training dollars, updates employee's workplans, and resource balances upcoming nuclear safety reviews.
18	F&I-3 Criteria 8	OFI	The NNSA/NSO FRAM assigns Team Leaders responsibilities for ensuring training and qualification of personnel that is inconsistent with internal policies related to staffing, recruitment, hiring, and performance evaluation.	NSO	AMSP Marelli	6/30/06		The NSO FRAM will be updated per 9/9/2004 Tom D'Agostino letter of direction.
19	F&I-3 Criteria 8	OFI	NNSA/NSO personnel performing reviews of Safety Basis and quality assurance documentation and leading safety basis review teams have not completed qualification requirements.	NSO	AMSP Rivas	6/30/06		NSO management has put this requirement into each of the safety basis and quality assurance professionals work plans. The plans will be monitored in April and necessary travel and training monies set aside for this training.
20	F&I-3 Criteria 8	OFI	ORR Team Leaders requiring qualifications under the NNSA/NSO TQP program needs to be re-established and updated to reflect changes to the current organizational structure.	NSO	AMSP Rivas	6/30/06		NSO will be updating the TQP program to reflect current organization structure.

NNSA/NSO DNFSB 2004-1 Commitment 25 NSO Site Action Plan

No.	Issue (CRAD Area)	Issue Category	Issue Statement	Contractor or Office Assigned	Lead for Corrective Action	Closure Due Date	caWeb Ref. #	Actions to Remedy the finding
21	F&I-3 Criteria 8	OFI	STSM Qualification Cards should be tailored to accommodate site-specific hazards and activities.	FTCP	FTCP Mellington	9/30/06		The FTCP will tailor STSM qualification cards by 9/30 for specific hazards and activities at the NTS. The FTCP will utilize contractor Hazard Analysis for identification of hazards.

Enclosure

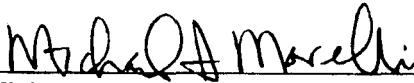
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**Nevada Site Office Assessment of
Defense Nuclear Facilities Safety Board
Finding 2004-1**

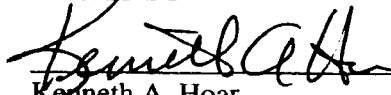
TEAM MEMBER APPROVAL

I, by signature below, concur with the conclusions and recommendations of the **National Nuclear Security Administration Nevada Site Office (NNSA/NSO) Assessment of Bechtel Nevada (BN) Radiological Monitoring Instrumentation and Calibration.**




Michael A. Marelli
NNSA/NSO

2/8/06
Date



Kenneth A. Hoar
NNSA/NSO

2/8/06
Date



R. T. Brock, Assistant Manager for Safety Programs
NNSA/NSO

2/9/06
Date

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ACRONYM LIST

AMSP	Assistant Manager for Safety Programs
A/DAMSP	Acting Deputy Assistant Manager for Safety Programs
BN	Bechtel Nevada
caWeb	Corrective Action Web (Issues Management)
CDNS	Chief Defence Nuclear Safety
CRAD	Criteria, Review, and Approach Document
CTA	Central Technical Authority
DNFSB	Defense Nuclear Facilities Safety Board
DOE	Department of Energy
FR	Facility Representative
ISM	Integrated Safety Management
LANL	Los Alamos National Laboratory
LLNL	Lawrence Livermore National Laboratory
NNSA	National Nuclear Security Administration
NSO	Nevada Site Office
NTS	Nevada Test Site
OFI	Opportunity for Improvement
SNJV	Stoller-Navarro Joint Venture
SNL	Sandia National Laboratory
WSI	Wackenhut Services Incorporated
WSS	Work Smart Standards

1.0 EXECUTIVE SUMMARY

The Defense Nuclear Facilities Safety Board (Board) issued its Recommendation 2004-1, Oversight of Complex, High-Hazard Nuclear Operations, on May 21, 2004. In its recommendation, the Board noted concerns regarding a number of safety issues, including delegations of authority for fulfilling safety responsibilities, federal technical capability, Central Technical Authorities, nuclear safety research, lessons learned from significant external events, and integrated safety management. The Department of Energy (DOE or Department) accepted the Board's recommendation on July 21, 2004. The Department provided its initial implementation plan on December 23, 2004.

The Department's implementation plan defines the actions that the Department will take in response to this recommendation. These actions fit into three broad areas:

- Strengthening Federal Safety Assurance
- Learning from Internal and External Operating Experience
- Revitalizing Integrated Safety Management (ISM) Implementation

The ISM core function, "feedback and improvement," is not yet performing as intended, according to a variety of sources. For example, the recent (July 2004) DOE Office of Independent Oversight Lessons Learned Report identified the "feedback and improvement" function as having important weaknesses and is not well established or implemented. DOE and its contractors have a variety of feedback mechanisms, including occurrence reports, self-assessments, oversight assessments, non-conformance reports, and others. In general, the Department is good at collecting "feedback, and not as good at making meaningful and lasting "improvement." For the Department's feedback mechanisms to be of benefit, deviations need to be reported and analyzed, and feedback mechanisms need to be integrated to identify problems and make improvements. Improved DOE attention to integration and use of "feedback and improvement" is very likely to generate improved attention and use by contractors as well. Effective reporting and improvement systems are essential elements of an effective safety culture, demonstrating core values of "questioning attitude" and "learning organization.

The Department developed an IP that addresses all issues. In Commitment Number 25 & 26, each site office must develop action plans to improve feedback and improvement. This requires each site office to review the implementation of "feedback and improvement" core element through disciplined line management oversight program, and provide both a summary status report to the Secretary and mid-course direction to direct reports on improving the institutionalization of ISM into the annual Departmental planning

From January 12 through 25, 2006, the A/DAMSP conducted a review of NNSA/NSO largest contractor, Bechtel Nevada (BN). A combination of conventional review techniques were used during the course of the assessment, including document reviews, personnel interviews, and field observations.

Overall, BN self-identified three issues requiring improvement. The issues self-identified by BN include:

- DOE O 226.1, Attachment 2, Section 2.e. requires that personnel who manage and perform assurance functions must possess experience, knowledge, skills, and abilities commensurate with their responsibilities. Although this requirement is implemented in performance documents (*refer to CRADs F&FI-1/6 and F&FI-2-2.4/6*), PD-3200.004 does not contain a specific discussion of how BN meets this requirement.
- DOE O 226.1, Attachment 2, Section 1 requires the contractor to flow down the requirements of the CRD to subcontractors to the extent necessary to ensure the subcontractors compliance with requirements. Although this requirement is implemented in performance documents (*refer to CRAD F&FI-1/3*), PD-3200.004 does not contain a specific discussion of how BN meets this requirement.
- DOE O 226.1, Attachment 2, Appendix A, Section 4 requires the implementation of processes to solicit feedback from workers and activities. Although this requirement is implemented in performance documents (*refer to CRADs F&FI-2-2.2/4*), PD-3200.004 does not contain a specific discussion of how BN meets this requirement.

The scopes of the listed weaknesses are limited to the incorporation of process descriptions into an administrative descriptive document (i.e., PD-3200.004) that does not impose requirements or drive work. The weaknesses do not reflect inadequate implementation of the requirements in BN performance documents.

In addition, NNSA/NSO received numerous findings related to qualification of staff, oversight, and issues management as identified in the NNSA/NSO MSA and the CDNS nuclear safety assessment. In addition, NNSA/NSO has not incorporated DOE Order 226.1, "Implementation of Department of Energy Oversight Policy" in contractors WSS.

WSI, SNJV were not assessed during this review nor the three National Laboratories: LANL, LLNL, or SNL.

2.0 INTRODUCTION

The Defense Nuclear Facilities Safety Board (Board) issued its Recommendation 2004-1, Oversight of Complex, High-Hazard Nuclear Operations, on May 21, 2004. In its recommendation, the Board noted concerns regarding a number of safety issues, including delegations of authority for fulfilling safety responsibilities, federal technical capability, Central Technical Authorities, nuclear safety research, lessons learned from significant external events, and integrated safety management. The Department of Energy (DOE or Department) accepted the Board's recommendation on July 21, 2004. The Department provided its initial implementation plan on December 23, 2004.

The Department's implementation plan defines the actions that the Department will take in response to this recommendation. These actions fit into three broad areas:

- Strengthening Federal Safety Assurance
- Learning from Internal and External Operating Experience
- Revitalizing Integrated Safety Management (ISM) Implementation

To resolve the identified issues within these areas, the Department has established a number of end-state commitments, described in this implementation plan, including the following:

- Two Central Technical Authorities (CTAs) with adequate technical support.
- Effective Implementation of Clarified DOE Oversight Model.
- Nuclear safety research function.
- Strengthened technical qualification of Federal safety assurance personnel.
- Formal safety delegation and assignment process.
- DOE Operating Experience Program, an element of the ISM "feedback and improvement" function.
- Clear expectations for ISM implementation for Federal organizations.
- Enhanced field focus on work planning and work control.
- Improved implementation of the ISM "feedback and improvement" function.

Commitment 25 & 26 require each site office to develop action plans to improve feedback and improvement. This includes reviewing the implementation of "feedback and improvement" core element through disciplined line management oversight program, and provide both a summary status report to the Secretary and mid-course direction to direct reports on improving the institutionalization of ISM into the annual Departmental planning

The reference set of expectations for reporting, integration and use of the feedback findings and improvement actions will address implementation differences between HQ program offices, field elements, and contractors. DOE organizations will use the "feedback and improvement" expectations in development/revision and implementation of DOE ISM system descriptions. Sites will develop and implement plans of action to improve their "feedback and improvement" processes to meet the expectations defined in the CRADs.

One requirement in the implementation plan is for each site office, after at least one year of experience is gained in implementing newly issued DOE ISM system descriptions, to review implementation of the "feedback and improvement" element and make necessary adjustments. Each site office will review the responses to the ISM expectations as part of the line oversight program and make adjustments to expectations and oversight, as appropriate.

The National Nuclear Security Administration/Nevada Site Office (NNSA/NSO), Office of the Assistant Manager for Safety Programs (AMSP), scheduled an assessment of Commitment 25 and 26 of the DNFSB 2004-1 implementation plan. CRADs were developed by the Department which was used to assess DOE Operating Experience Program and implementation of the ISM "feedback and improvement" function.

The assessment was conducted January 12 through January 26, 2005, by the NNSA/NSO Acting Assistant Manager for Safety Programs. A combination of conventional review techniques were used during the course of the assessment, including document reviews, personnel interviews, and field observations.

The CRADs used for this assessment contained three Performance Objectives and a total of 34 criteria. The A/DAMSP conducted interviews of personnel ranging from BN Contractor

Assurance and Compliance Manager to staff personnel.

3.0 SCOPE

The assessment scope included three Performance Objectives as identified below:

Performance Objective 1: Contractor Program Documentation

Contractor Line management has established a comprehensive and integrated operational assurance system which encompass all aspects of the processes and activities designed to identify deficiencies and opportunities for improvement, report deficiencies to the responsible managers, complete corrective actions.

Performance Objective 2: Contractor Program Implementation

Assessments & Performance Indicators: Contractor Line management has established a rigorous and credible assessment program that evaluates the adequacy of programs, processes, and performance on a recurring basis. Formal mechanisms and processes have been established for collecting both qualitative and quantitative information on performance and this information is effectively used as the basis for informed management decisions to improve performance.

Operating Experience: The Contractor has developed and implemented an Operating Experience program that communicates Effective Practices and Lessons Learned during work activities, process reviews, and incident/event analyses to potential users and applied to future work activities.

Event Reporting: Contractor line management has established and implemented programs and processes to identify, investigate, report, and respond to operational events and incidents and occupational injuries and illnesses.

Issues Management: The Contractor has developed and implemented a formal process to evaluate the quality and usefulness of feedback, and track to resolution performance and safety issues and associated corrective actions.

Performance Objective 3: DOE Line Management Oversight

DOE line management have established and implemented effective oversight processes that evaluate the adequacy and effectiveness of contractor assurance systems and DOE oversight processes.

During the field visit, two locations were identified to demonstrate implementation of WSS and company documents. The BN work location assessed were:

- Area 5 Radioactive Waste Management Site.
- Area 5 Nonproliferation Test and Evaluation Complex (NPTEC).

4.0 SCHEDULE

The assessor scheduled office work from January 12 through the 23, 2005. Field work was conducted on January 25, 2006, with reporting writing on January 26 through 31, 2006.

5.0 PROCESS

The assessment was conducted in meeting the Departments DNFSB 2004-1 commitments as identified in the DOE implementation plan. Using DOE approved CRADS, a combination of conventional review techniques were used during the course of the assessment, including document reviews, personnel interviews, and field observations.

The following is a list of the review team members:

Michael A. Marelli, Senior Advisor to the AMSP
Kenneth A. Hoar, A/DAMSP

Appendix A contains a biographical summary of Mr. Marelli and Mr. Hoar's experience and qualifications.

Below is a list of requirements, guidance and individuals interviewed using DOE approved CRADs.

REQUIREMENTS

- DOE 5480.19, *Conduct of Operations Requirements for DOE Facilities*
- DOE Policy 450.4 *Integrated Safety Management*
- DOE Order 440.1a *Federal Employee Occupational Safety and Health Program*
- DOE Order 231.1a *Occurrence Reporting and Processing of Operations Information*
- DOE Order 414.1c *Quality Assurance*
- DOE Order 442.1a *DOE Employee Concerns Program*
- DOE P 226.1, *Department of Energy Oversight Policy*
- DOE O 226.1, *Implementation of Department of Energy Oversight Policy*
- 10 CFR 830, *Nuclear Safety Management*
- NSO M 111.XE, *Functions, Responsibilities, And Authorities Manual*
- NV O 124.X, *Planning And Budget Prioritization Of Work*
- NV O 230.XA, *DOE/NV Lessons Learned Program*
- NV M 220.XC, *NNSA/NSO Oversight Management System*
- NSO O 442.1B, *Nevada Site Office Employee Concerns*

GUIDANCE

- Draft DOE Order 210.x: *Corporate Operating Experience Program*
- DOE G 450.4-1B, *Integrated Safety Management System Guide*

INDIVIDUALS INTERVIEWED:

- Brian Babero, BN, Senior Engineer
- Patrick Sawyer, BN, NPTEC Manager
- Shawn Line, BN, NPTEC Facility Manager
- Mark Kaplan, BN, Senior Engineer
- Rob Williams, Senior Engineer
- Janet Fox, Senior Engineer
- M.W. Millard, BN, Senior Engineer
- Chris Chalupka, BN
- Garth Beers, BN, Safety & Health Manager
- Doris Burnett, BN, Principal Operations Specialist
- Robert McCook, Manager of Contractor Assurance and Compliance
- Stuart Meredith, Senior Engineer
- Andrea Gile, Senior Operations Specialist
- Craig Barnes, Manager, Contractor Assurance and Compliance
- Rhyan Andrews, Senior Engineer
- Terri Dionizio, Senior Engineer
- Mark Krauss, Senior Engineer
- Jack Todd, Manager, Contractor Assurance and Compliance
- Ray Phifer, NNSA/NSO Assistant Manager for Safeguards & Security
- Sara Rhoades-Anderson, NNSA/NSO Security Specialist
- Robert T. Brock, Assistant Manager for Safety Programs
- Daniel Rivas, NNSA/NSO Nuclear Safety Team Leader

6.0 ASSESSMENT TERMINOLOGY

The following terminology and criteria will be used in documenting the assessment results:

Finding: A non-compliance with an established BN Work Smart Standard (WSS) requirement. A finding may involve failure to “flow-down” a requirement through implementing NSO directives/ procedures, or failure to perform a required action or execute a required responsibility. A finding also involves a condition, process, or system that is inconsistent with an established BN Company Document (CD) or Company Manual (CM).

OFI: A best practice or process improvement that if applied to a particular activity could result in improved effectiveness or improved performance. OFIs extend beyond compliant processes, programs, or systems that satisfy base requirements. OFIs are based upon lessons learned from other organizational elements internal or external to BN in the implementation or application of the same or similar requirements.

Noteworthy Practice: An approach, practice, system, or process that extends beyond meeting base BN WSS, CD and/or CM requirements which has potential application to other organizational elements or functional areas because of its contribution to the effectiveness or high level of performance.

7.0 ASSESSMENT RESULTS

Appendix C contains a detailed analysis of the NNSA/NSO assessment of Bechtel Nevada. Overall, BN self-identified three issues utilizing the Department developed CRADs. One OFI was identified in that DOE Operating Experience information is not consistently communicated with all Lessons Learned Coordinators in the field. Finally, NNSA/NSO had numerous deficiencies which were previous identified in a NNSA/NSO MSA and nuclear safety assessment conducted by the CDNS organization. One finding that was not in the MSA or CDNS assessment was DOE O 226.1 is not in the contracts of BN, WSI, SNJV, LANL, LLNL, and SNL.

APPENDIX A

TEAM MEMBER BIOGRAPHY

Michael A. Marelli
SENIOR ADVISOR TO THE NNSA/NSO AMSP

Mr. Marelli is a seasoned professional with 28 year of service. He holds M.S., Health Physics and a B.S., Nuclear Engineering from the University of Florida. He has had numerous training courses including Documented Safety Analyses, Unresolved Safety Question, ISO 9000 Lead Auditor Training, ORR for Line Managers, and numerous other ES&H and Quality Assurance Courses. He worked for the University of Florida as a Project Manager for the Environmental Radiation Surveillance Program conducted for the Florida Power Corporation, Crystal River Nuclear Power Plant. He has spent the predominant portion of his career with the Department of Energy as a staff Health Physicist responsible for technical management and oversight of contractor radiation protection programs associated with the Nuclear Weapons Test program and other hazardous operations conducted at the Nevada Test Site and at DOE Headquarters. While serving at DOE/HQ, develop the health physics review criteria for Technical Safety Appraisals and Tiger Teams and participated in these nuclear facility assessments throughout the DOE complex. While serving at the Nevada Operations Office, managed numerous health physics related activities and programs including the CLIMAX spent reactor fuel Encapsulation and Temporary Storage Testing Program, Environmental Clean-up of Enewetak Atoll, Federal Radiological Management and Assessment Center (FRMAC) program development and field deployments, numerous underground nuclear test site decontamination/ decommissioning activities, satellite-linked environmental radiation detection system, site-wide environmental monitoring, film-badge to thermoluminescent dosimeter conversion, whole-body counter facility construction, and the Device Assembly Facility Safety Analysis and Design review effort. Served as a Radiological Safety Advisor and as a member of the Test Controller's Panel for over 50 nuclear weapons tests and numerous sub-critical experiments.

More recently, he has served in various supervisory and management positions with the department and the National Nuclear Security Administration. He led the development of the Nevada Site Office's implementation of Integrated Safety Management, developed the NSO Quality Assurance Program, and led the implementation of the NSO Contractor Assurance System. He as also supported NNSA/HQ in numerous leadership roles including development of NNSA's Policy on Self-Assessment, NNSA's foundation for ES&H Professional Training, and NNSA attributes of Work Control. He recently served as the Deputy Team Leader on an NSO Device Assembly Operational Readiness Review. He currently occupies a senior advisor position primarily responsible for quality assurance.

Kenneth A. Hoar
NNSA/NSO A/DAMSP

Kenneth A. Hoar has approximately 20 years of Environment, Safety and Health experience. Mr. Hoar began his working career (1985) as the Operations Manager for a full-service hazardous waste company. In this position, Mr. Hoar was responsible for the health and safety of 50 on-site workers.

Mr. Hoar held the title of Chemist (1987) while employed by Ross Abbott Laboratories. As a production chemist, Mr. Hoar was responsible for analyzing infant and medical nutritionals using various types of laboratory analytical instrumentation. In 1989, Mr. Hoar designed, equipped, staffed and managed a full service environmental Laboratory in Las Vegas, Nevada. In addition to supervising 15 laboratory personnel, Mr. Hoar was the technical liaison for the hydrocarbon burdened soil bioremediation facility. In his job capacity, Mr. Hoar was author to numerous reports, such as the Chemical Hygiene (i.e., Health & Safety Plan), Emergency Management, and Contingency Plans.

In 1992, Mr. Hoar accepted a position as the Radioactive Waste Management Specialist for Reynolds Electric and Engineering Company at the Nevada Test Site. Mr. Hoar was responsible for the collection and transportation of solid and hazardous wastes. Annual budget for landfill, wastewater treatment plant, portable toilet, pesticide and recycling operations exceeded \$5M (indirect) dollars. Mr. Hoar managed 3 sanitary landfills, 3 solid waste transfer stations, a Materials Recovery Facility, 13 different wastewater treatment plants, maintenance and repair of sewer lines, 800 portable toilets, a fleet of 40 vehicles, and a staff of 40 union and management personnel.

In 1995, Mr. Hoar was hired by the U.S. Department of Energy Nevada Operations Office (DOE/NVOO) as an environmental scientist. During this period, Mr. Hoar was responsible for oversight of solid and hazardous waste operations and environmental reporting. In 1996, Mr. Hoar was hired as the Director for the DOE/NVOO Environmental Protection Division. He led an effort to integrate the Environmental Protection and Safety & Health Divisions in 1997. Since then, he has been the ES&H Director and in 2005, acted as the AMSP. Mr. Hoar is the NNSA/NSO Price Anderson Amendment Act Coordinator and served on the DOE Human Health Studies Working Group. Mr. Hoar has served or led on many internal and external initiatives. Some of these initiatives include: Type B Accident Investigation at the Tonopah Test Range; DOE/HQ initiative to reduce reports; (2) A-76 feasibility studies on environmental compliance; Re-engineering effort of the annual ES&H Management Plan; numerous IG investigations; and the Worker Safety Rule.

Mr. Hoar has a Master of Arts in Management from the University of Phoenix and a Bachelor of Science in Chemistry, Northeastern State University with minors in math, biology, psychology and engineering.

APPENDIX B

CRITERIA AND REVIEW APPROACH DOCUMENT (CRAD)

Integrated Safety Management – Feedback and Improvement

Performance Objective F&I-1: Contractor Program Documentation

Contractor Line management has established a comprehensive and integrated operational assurance system which encompass all aspects of the processes and activities designed to identify deficiencies and opportunities for improvement, report deficiencies to the responsible managers, complete corrective actions, and share in lessons learned effectively across all aspects of operation.

Criteria:

1. A program description document that fully details the programs and processes that comprise the contractor assurance system has been developed, approved by contractor management, and forwarded to DOE for review and approval. The program description is reviewed and updated annually and forwarded to DOE for review and approval.
2. The contractor's assurance system includes assessment activities (self-assessments, management assessments, and internal independent assessments as defined by laws, regulations, and DOE directives such as quality assurance program requirements) and other structured operational awareness activities; incident/event reporting processes, including occupational injury and illness and operational accident investigations; worker feedback mechanisms; issues management; lessons-learned programs; and performance indicators/measures.
3. The contractor's assurance system monitors and evaluates all work performed under their contract, including the work of subcontractors.
4. Contractor assurance system data is formally documented and available to DOE line management. Results of assurance processes are periodically analyzed, compiled, and reported to DOE line management as part of formal contract performance evaluation.
5. Contractors have established and implemented sufficient processes (e.g., self-assessments, corporate audits, third-party certifications or external reviews, performance indicators) for measuring the effectiveness of the contractor assurance program.
6. Requirements and formal processes have been established and implemented that ensure personnel responsible for managing and performing assurance activities possess appropriate experience, knowledge, skills and abilities commensurate with their responsibilities.

Performance Objective F&I-2: Contractor Program Implementation

2.1 Assessments & Performance Indicators: Contractor Line management has established a rigorous and credible assessment program that evaluates the adequacy of programs, processes, and performance on a recurring basis. Formal mechanisms and processes have been established

for collecting both qualitative and quantitative information on performance and this information is effectively used as the basis for informed management decisions to improve performance.

Criteria:

1. Line management has established and implemented a rigorous assessment program for performing comprehensive evaluations of all functional areas, programs, facilities, and organizational elements, including subcontractors, with a frequency, scope and rigor based on appropriate analysis of risks. The scope and frequency of assessments are defined in site plans and program documents, include assessments of processes and performance-based observation of activities and evaluation of cross-cutting issues and programs, and meet or exceed requirements of applicable DOE directives.
2. Rigorous self-assessments are identified, planned, and performed at all levels periodically to determine the effectiveness of policies, requirements, and standards and the implementation status.
3. Appropriate independent internal assessments are identified, planned and performed by contractor organizations or personnel having the authority and independence from line management, to support unbiased evaluations.
4. Line managers have established programs and processes to routinely identify, gather, verify, analyze, trend, disseminate, and make use of performance measures that provide contractor and DOE management with indicators of overall performance, the effectiveness of assurance system elements, and identification of specific positive or negative trends. Approved performance measures provide information that indicates how work is being performed and are clearly linked to performance objectives and expectation established by management.
5. Line managers effectively utilize performance measures to demonstrate performance improvement or deterioration relative to identified goals, in allocating resources and establishing performance goals, in development of timely compensatory measures and corrective actions for adverse trends, and in sharing good practices and lessons learned.

2.2 Operating Experience: The Contractor has developed and implemented an Operating Experience program that communicates Effective Practices and Lessons Learned during work activities, process reviews, and incident/event analyses to potential users and applied to future work activities.

Criteria:

1. Formal processes are in place to identify applicable lessons learned from external and internal sources and any necessary corrective and preventive actions, disseminate lessons learned to targeted audiences, and ensure that lessons learned are understood and applied.
2. Line managers effectively identify, apply, and exchange lessons learned with the rest of the DOE complex. Lessons learned identified by other DOE organizations and external

sources are reviewed and applied by line management to prevent similar incidents/events.

3. Formal programs and processes have been established and implemented to solicit feedback or suggestions from workers and work activities on the effectiveness of work definition, hazard analyses and controls, and implementation for all types of work activities, and to apply lessons learned.
4. Employee concerns related to management of DOE and NNSA programs and facilities are promptly and thoroughly reported and investigated in accordance with applicable DOE directives.

2.3 Event Reporting: Contractor line management has established and implemented programs and processes to identify, investigate, report, and respond to operational events and incidents and occupational injuries and illnesses.

Criteria:

1. Formal programs and processes have been established to identify issues and report, analyze, and address operational events, accidents, and injuries. Events, accidents, and injuries are promptly and thoroughly reported and investigated, including the identification and resolution of root causes and management and programmatic weaknesses, and distribution of lessons learned.
2. Reporting of operational events, accidents, and injuries are conducted in accordance with applicable nuclear, security, environment, occupational safety and health, and quality assurance requirements, applicable DOE directives, and contract terms and conditions. Trending analysis of events, accidents, and injuries are performed in accordance with structured/formal processes and applicable DOE directives.

2.4 Issues Management: The Contractor has developed and implemented a formal process to evaluate the quality and usefulness of feedback, and track to resolution performance and safety issues and associated corrective actions.

Criteria:

1. Program and performance deficiencies, regardless of their source, are captured in a system or systems that provides for effective analysis, resolution, and tracking. Issues management system elements include structured processes for determination of risk, significance, and priority of deficiencies; evaluation of scope and extent of condition; determination of reportability under applicable requirements; identification of root causes; identification and documentation of corrective actions and recurrence controls to prevent recurrence; identification of individuals/organizations responsible for corrective action implementation; establishment of milestones based on significance and risk for completion of corrective actions; tracking progress; verification of corrective action completion; and validation of corrective action implementation and effectiveness.

2. Issues management processes include mechanisms to promptly identify the potential impact of a deficiency and take timely actions to address conditions of immediate concern, including stopping work, system shutdown, emergency response, reporting to management, and compensatory measures pending formal documentation and resolution of the issue.
3. Processes for analyzing deficiencies, individually and collectively, have been established that enable the identification of programmatic or systemic issues. Line management effectively monitors progress and optimizes the allocation of assessment resources in addressing known systemic issues.
4. Processes for communicating issues up the management chain to senior management have been established and based on a graded approach that considers hazards and risks. Line management receives periodic information on the status of identified deficiencies and corrective actions and holds organizations and individuals accountable for timely and effective completion of actions. Line management has executed graded mechanisms such as independent verification and performance-based evaluation to ensure that corrective action and recurrence controls are timely, complete, and effective. Closure of corrective actions and deficiencies are based on objective, technically sound, and verified evidence. The effectiveness of corrective actions is determined on a graded basis and additional actions are completed as necessary.
5. Results of various feedback systems are integrated and collectively analyzed to identify repeat occurrences, generic issues, trends, and vulnerabilities at a lower level before significant problems result.
6. Individuals or teams responsible for corrective action development are trained in analysis techniques to evaluate significant problems using a structured methodology to identify root and contributing causes and corrective actions to prevent recurrence.

Performance Objective F&I-3: DOE Line Management Oversight

DOE line management have established and implemented effective oversight processes that evaluate the adequacy and effectiveness of contractor assurance systems and DOE oversight processes.

Criteria:

1. DOE line management has established a baseline line management oversight program that ensures that DOE line management maintains sufficient knowledge of site and contractor activities to make informed decisions concerning hazards, risks and resource allocation, provide direction to contractors, and evaluate contractor performance.
2. DOE line oversight program includes assessments, operational awareness activities, performance monitoring and improvement, and assessment of contractor assurance systems. Documented program plans have been established that define oversight program

activities and annual schedules of planned assessments and focus areas for operational awareness. Operational awareness activities must be documented either individually or in periodic (e.g., weekly or monthly) summaries. Deficiencies in programs or performance identified during operational awareness activities are communicated to the contractor for resolution through a structured issues management process.

3. DOE line management monitors contractor performance and assesses whether performance expectations are met; that contractors are assessing site activities adequately; self-identifying deficiencies; and, taking timely and effective corrective actions. Responsibilities for line oversight and self-assessment are assigned and managers, supervisors, and workers are held accountable for performance assurance activities. Deficiencies must be brought to the attention of contractor management and addressed in a timely manner.
4. DOE line management requires that findings must be tracked and resolved through structured and formal processes, including provisions for review of corrective action plans.
5. DOE line management regularly assess the effectiveness of contractor issues management and corrective action processes, lessons learned processes, and other feedback mechanisms (e.g., worker feedback). DOE line management must also evaluate contractor processes for communicating information, including dissenting opinions, up the management chain.
6. DOE line management must verify that corrective actions are complete and performed in accordance with requirements before findings identified by DOE assessments or reviews are closed, and requires that deficiencies are analyzed both individually and collectively to identify causes and prevent recurrences.
7. DOE line management has established appropriate criteria for determining the effectiveness of site programs, management systems, and contractor assurance systems, and includes consideration of previous assessment results, effectiveness of corrective actions and self-assessments, and evidence of sustained management support for site programs and management and assurance systems. Review criteria are based on requirements and performance objectives (e.g., laws, regulations, DOE directives), site-specific procedures/manuals, and other contractually mandated requirements and performance objectives.
8. DOE line management has established and maintained appropriate qualification standards for personnel with oversight responsibilities, and a clear, unambiguous line of authority and responsibility for oversight.
9. DOE Line management periodically reviews established performance measures to ensure performance objectives and criteria are challenging and focused on improving performance in known areas of weakness.

10. DOE line management has established effective processes for communicating line oversight results and other issues up the DOE line management chain, using a graded approach based on the hazards and risks. Established processes include provisions for communicating and documenting dissenting opinions. Formal structured processes for resolving disputes for oversight findings and other significant issues have been implemented, and include provisions for independent technical reviews for significant findings.
11. An effective employee concerns program been established and implemented in accordance with DOE Directives that encourages the reporting of employee concerns and provides thorough investigations and effective corrective actions and recurrence controls.

APPROACH:

Review and evaluate policies, procedures, records, correspondence, and reports documenting the ISM program. Interview line managers, their staff and managers of support organizations and their staff to determine implementation status.

APPENDIX C

Assessment Results

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
F&FI-1	Contractor Program Documentation Contractor Line management has established a comprehensive and integrated operational assurance system which encompass all aspects of the processes and activities designed to identify deficiencies and opportunities for improvement, report deficiencies to the responsible managers, complete corrective actions, and share in lessons learned effectively across all aspects of operation.				
F&FI-1/1	<p>A program description document that fully details the programs and processes that comprise the contractor assurance system has been developed, approved by contractor management, and forwarded to DOE for review and approval.</p> <p>The program description is reviewed and updated annually and forwarded to DOE for review and approval.</p>	DOE O 226.1, Attachment 2, 2.c.	<p>PD-3200.004 Discussion Location: Entire document</p> <p>Implementation Documents:</p> <ul style="list-style-type: none">OP-3200.038, Contractor Assurance and Compliance System (CAS) Program Description Document Development and Maintenance <p>Supplemental Discussion: Regarding the annual update, the description document was initially issued on 9/22/03 and revised and reissued on 9/30/04, 12/29/04, and 12/6/05. Revisions prior to 12/6/05 were provided to NSO as deliverables for fee measure.</p> <p>NSO initially reviewed and approved the CAS Program Description Document in NSO to NA-2 Memorandum 000129585 on 11/16/04.</p> <p>The formal process for annual update and formal transmittal was institutionalized on 9/6/05 in OP-3200.038 and the first transmittal under this process was provided on 1/13/06 as an attachment to BN to NSO letter E000-06-CR-020.</p> <p>Issues: None</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F&FI-1/2	The contractor's assurance system includes assessment activities (self-assessments, management assessments, and internal independent assessments as defined by laws, regulations, and DOE directives such as quality assurance program requirements) and other structured operational awareness activities; incident/event reporting processes, including occupational injury and illness and operational accident investigations; worker feedback mechanisms; issues management; lessons-learned programs; and performance indicators/measures.	DOE O 226.1, Attachment 2, 2.b.	<p>PD-3200.004 Discussion Location: Entire document</p> <p>Implementation Documents:</p> <ul style="list-style-type: none">CD-0400.002, Occurrence Reporting and Notification ProcessCD-2000.008, Operational Readiness ReviewsCD-3200.007, Price-Anderson Amendments Act ProcessCD-3200.008, Conduct of CritiquesCD-3200.009, Root Cause AnalysisCD-3200.010, Management AssessmentCD-3200.013, Lessons Learned ProgramCD-3200.016, Readiness AssessmentCD-3200.017, Issue ReportingCD-3200.018, Developing Corrective Action PlansCD-3200.019, Quarterly Analysis ReportingCD-4000.003, Pre-Job Briefing and Post-Job DebriefingsCM-0444.001-002, Environment, Safety, and Health CommitteesCM-0444.001-006, Formal Workplace Inspection Program (FWIP)CM-0444.001-007, Accident/Incident Notifying, Investigating, and Reporting	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
			<ul style="list-style-type: none"> CM-0444.001-200, Organizational Interface for Worker Protection OP-3200.002, Independent Assessment OP-3200.005, Site Lessons Learned Coordinator OP-3200.030, Companywide Issue Tracking Data Processing OP-3200.034, Surveillance OP-3200.039, Operational Awareness Review OP-3700.011, Facility Security Survey/Self-Assessment Corrective Action Planning OP-3700.012, Corrective Action Plans for Security Infractions PD-3200.003, Self-Assessment Program PY-E300.002, Internal Audit Policy <p>Supplemental Discussion: None</p> <p>Issues: None</p>		
F&FI-1/3	The contractor's assurance system monitors and evaluates all work performed under their contract, including the work of subcontractors.	DOE O 226.1, Attachment 2, 1. and Appendix A, Section 1.f.	<p>PD-3200.004 Discussion Location: Page 5, Scope. Specific discussion subcontractors has not been incorporated although that work is clearly bounded by the document's general Scope statement and implementing procedures.</p> <p>Implementation Documents: Refer to F&FI-1/2 for general oversight documents. Specific documents pertaining to subcontractor oversight follow:</p> <ul style="list-style-type: none"> OP-2113.001, Subcontract Technical Representative OP-2113.002, Subcontracts Management Subcontractor Technical Representative Handbook PY-E300.002, Internal Audit Policy <p>Supplemental Discussion: This system applies to all areas of BN performance including programs, projects, operations, and business function. Except where specifically noted, there is distinction drawn between BN and subcontractor performance and requirements. Specific oversight of subcontractor performance is addressed in the STR Handbook.</p> <p>Issues: DOE O 226.1, Attachment 2, Section 1 requires the contractor to flow down the requirements of the CRD to subcontractors to the extent necessary to ensure the subcontractors compliance with requirements. Although this requirement is implemented in performance documents (<i>refer to CRAD F&FI-1/3</i>), PD-3200.004 does not contain a specific discussion of how BN meets this requirement.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F&FI-1/4	Contractor assurance system data is formally documented and available to DOE line management. Results of assurance processes are periodically analyzed, complied,	DOE O 226.1, Attachment 2, 2.h.	<p>PD-3200.004 Discussion Location: Page 6, Assurance Expectations Page 17, Conveying Comprehensive Assurance Information to NNSA/NSO</p> <p>Implementation Documents:</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
	and reported to DOE line management as part of formal contract performance evaluation.		<ul style="list-style-type: none"> CD-0400.002, Occurrence Reporting and Notification Process CD-2000.008, Operational Readiness Reviews CD-3200.007, Price-Anderson Amendments Act Process CD-3200.009, Root Cause Analysis CD-3200.010, Management Assessment CD-3200.013, Lessons Learned Program CD-3200.016, Readiness Assessment CD-3200.017, Issue Reporting CD-3200.019, Quarterly Analysis Reporting CM-0444.001-007, Accident/Incident Notifying, Investigating, and Reporting OP-3200.002, Independent Assessment OP-3200.034, Surveillance OP-3200.039, Operational Awareness Review PY-E300.002, Internal Audit Policy <p>Supplemental Discussion: Information is conveyed to NNSA/NSO primarily through the following four mechanisms:</p> <ul style="list-style-type: none"> Companywide issues tracking system Quarterly analysis reports Performance Evaluation Plan (or NSO-directed alternative format) Annual assurance statement <p>In all cases, NNSA/NSO personnel are given free and unencumbered access to any CAS information.</p> <p>Beginning in FY04 CAS has been recognized as a core BN process and its implementation has been given significant attention as a Performance Measure. Performance of specific elements of interest to NSO is under monthly evaluation in the Fee Measure Database, quarterly evaluation in the Quarterly Analysis Report, and annual performance is evaluated under the Performance Evaluation Plan or NSO-directed alternative.</p> <p>Issues: None</p>		
F&FI-1/5	Contractors have established and implemented sufficient processes (e.g., self-assessments, corporate audits, third-party certifications or external reviews, performance indicators) for measuring the effectiveness of the contractor assurance program.	DOE O 226.1, Attachment 2, Appendix A, Section 1.d and 1.e.	<p>PD-3200.004 Discussion Location: Entire document</p> <p>Implementation Documents:</p> <ul style="list-style-type: none"> Refer to F&FI-1/2 Integrated Self-Assessment Schedule <p>Supplemental Discussion: Refer to F&FI-1-1/2, 2-2.1/1, 2.1/3, 2.1/4, 2.1/5, 2.2/1, and 2.2/2.</p> <p>Issues: None</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F&FI-1/6	Requirements and formal processes have been established and implemented that ensure personnel responsible for managing and performing	DOE O 226.1, Attachment 2, 2.e.	<p>PD-3200.004 Discussion Location: Specific discussion of this element is not provided in PD-3200.004. General discussion of training processes and training program for BN employees provided on Page 15, Personnel Qualification and</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
	assurance activities possess appropriate experience, knowledge, skills and abilities commensurate with their responsibilities		<p><u>Training.</u></p> <p>Implementation Documents:</p> <ul style="list-style-type: none"> • Course # 1G000562, Management Assessment Briefing • OP-2110.115, Training, Qualification, and Certification of Inspection Personnel • OP-2110.128, Certification and Qualification of Quality Control Engineers • OP-2110.206, Qualification & Certification of Nondestructive Testing Personnel • OP-2113.001, Subcontract Technical Representative • OP-3200.005, Site Lessons Learned Coordinator • OP-3200.006, Qualification and Certification of Assessment Personnel • OP-3200.035, Qualifying Critique Directors and Causal Analysts • PY-E300.002, Internal Audit Policy • Subcontract Technical Representative Handbook • Training Program # PA00100, ORR/RA Team Leader • Training Program # PA00110, ORR/RA Team Member <p>Supplemental Discussion: None</p> <p>Issues: DOE O 226.1, Attachment 2, Section 2.e. requires that personnel who manage and perform assurance functions must possess experience, knowledge, skills, and abilities commensurate with their responsibilities. Although this requirement is implemented in performance documents (<i>refer to CRADs F&FI-1/6 and F&FI-2-2.4/6</i>), PD-3200.004 does not contain a specific discussion of how BN meets this requirement.</p>		
F&FI-2-2.1	<p>Contractor Program Implementation</p> <p><u>Assessments & Performance Indicators:</u> Contractor Line management has established a rigorous and credible assessment program that evaluates the adequacy of programs, processes, and performance on a recurring basis. Formal mechanisms and processes have been established for collecting both qualitative and quantitative information on performance and this information is effectively used as the basis for informed management decisions to improve performance.</p>				
F&FI-2-2.1/1	<p>Line management has established and implemented a rigorous assessment program for performing comprehensive evaluations of all functional areas, programs, facilities, and organizational elements, including subcontractors, with a frequency, scope and rigor based on appropriate analysis of risks.</p> <p>The scope and frequency of assessments are defined in site plans and program documents, include assessments of processes and performance-based</p>	DOE O 226.1, Attachment 2, Appendix A, Section 2.a and b.	<p>PD-3200.004 Discussion Location: Page 12, Systemic Assessments</p> <p>Implementation Documents:</p> <ul style="list-style-type: none"> • CD-2000.008, Operational Readiness Reviews • CD-3200.010, Management Assessment • CD-3200.016, Readiness Assessment • OP-3200.034, Surveillance • OP-3200.039, Operational Awareness Review • PD-3200.003, Self-Assessment Program • PY-E300.002, Internal Audit Policy <p>Supplemental Discussion: The line management assessment program is focused upon the performance of Management Assessments (MAs). MAs are formally conducted and</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
	observation of activities and evaluation of cross-cutting issues and programs, and meet or exceed requirements of applicable DOE directives.		<p>documented by the Responsible Managers to evaluate how well their organization is performing. These are formal line management evaluations credited as meeting the expectations of 10CCFR 830.122 (i) and DOE O 414.1C, I2.c.(1).</p> <p>The process starts with deliberate quality assurance planning and is based upon facility, project, or support activity specific factors integrated with the BN risk management processes according to CD-3200.020 and is documented in the Risk Registry maintained by Contractor Assurance & Compliance organization. Typically these MAs focus on controls and processes used to mitigate or prevent adverse occurrence. The frequency, depth, and breadth of these assessments will place emphasis on the higher risk activities and makes no distinction between BN and subcontractor performance.</p> <p>Other topics for consideration in the MA schedule include contractual commitments, verifications of PAAA non reportable non-compliances, lessons learned, and things of interest to senior management. Once established, the list of assessments is forwarded to CA&C for incorporation into the Integrates Self-Assessment Schedule (ISAS). Although CA&C maintains the schedule, the content, performance, and any changes to the schedule are determined by the responsible line management organization.</p> <p>Line management performs management assessments to the schedule. CD-3200.010 provides the guidance to support planning, conducting, documenting, and evaluating the assessments. In addition, CA&C reviews the majority of the MA reports and provides feedback to line management associated with the content, format, and consistency of the report quality. This information is then used by line management to enhance the reporting of subsequent MAs.</p> <p>Issues: None</p>		
F&FI-2-2.1/2	Rigorous self-assessments are identified, planned, and performed at all levels periodically to determine the effectiveness of policies, requirements, and standards and the implementation status.	DOE O 226.1, Attachment 2, Appendix A, Section 2.a and b.	<p>PD-3200.004 Discussion Location:</p> <p>Implementation Documents: Refer to F&FI-2-2.1/1</p> <p>Supplemental Discussion: Refer to F&FI-2-2.1/1</p> <p>Issues: None</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F&FI-2-2.1/3	Appropriate independent internal assessments are identified, planned and performed by contractor organizations or personnel having the authority and independence from line management, to support unbiased evaluations.	DOE O 226.1, Attachment 2, Appendix A, Section 2.a and b.	<p>PD-3200.004 Discussion Location: Page 12, Systemic Assessments</p> <p>Implementation Documents:</p> <ul style="list-style-type: none"> • CD-2000.008, Operational Readiness Reviews • CD-3200.016, Readiness Assessment • OP-3200.002, Independent Assessment • OP-3200.034, Surveillance • OP-3200.039, Operational Awareness Review 	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
			<ul style="list-style-type: none"> PD-3200.003, Self-Assessment Program PY-E300.002, Internal Audit Policy <p>Supplemental Discussion: The identification, planning and performance of nuclear readiness reviews are adequately implemented in CD-3200.016 and CD-2000.008. These nuclear processes are driven by DOE Order 425.1B/C, and are adequately covered in these procedures. Some DNFSB concerns have arisen across the DOE complex regarding specifying the performance of less rigorous reviews than those specified in 425.1B/C. These concerns were discovered in the recent CDNS nuclear operations review at the NTS, and manifested in Finding SNF.1-1/F. BN will evaluate changes required to the above CDs based on changes to the NSO driver addressed in the Finding. That said, no evidence exists that suggests that any BN nuclear activities failed to receive the appropriate level of review prior to startup or restart.</p> <p>OP-3200.002 defines the BN process for selection, planning and conduct of Independent Assessments. Independence of the process as stated in the criterion is assured by the nature of the reporting relationship of the BN Independent Assessment group to the BN Assessment Manager to the BN Contractor Assurance and Compliance Manager up through the BN General Manager. Planning and performance of Independent Assessments is clearly defined in OP-3200.002, which specifies in detail the contents of such documents as assessment plans, summary of assessment reports and final reports. The question of identification of assessment topics is also addressed, in high level fashion, in OP-3200.002. Some enhancements to the process of selection of assessment topics is in order, in that no pre-defined baseline exists for independent assessments. It is the intent of the assessment group to establish, as a baseline, periodic assessments of nuclear safety management programs, which also include 'spillover' to non-nuclear work. BN has demonstrated good topic selection that results in the discovery of significant program weaknesses such as in explosive safety, and hoisting and rigging.</p> <p>Issues: None</p>		
F&FI-2-2.1/4	Line managers have established programs and processes to routinely identify, gather, verify, analyze, trend, disseminate, and make use of performance measures that provide contractor and DOE management with indicators of overall performance, the effectiveness of assurance system elements, and identification of specific positive or negative trends.	DOE O 226.1, Attachment 2, Appendix A, Section 7.	<p>PD-3200.004 Discussion Location: Page 7, Functional Program Page 15, Performance Metrics Page 23, Project Management</p> <p>Implementation Documents:</p> <ul style="list-style-type: none"> CD-3200.019, Quarterly Analysis Reporting OP-3200.030, Companywide Issue Tracking Data Processing PD-3200.003, Self-Assessment Program <p>Supplemental Discussion: None</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
	Approved performance measures provide information that indicates how work is being performed and are clearly linked to performance objectives and expectation established by management.		Issues: None		
F&FI-2-2.1/5	Line managers effectively utilize performance measures to demonstrate performance improvement or deterioration relative to identified goals, in allocating resources and establishing performance goals, in development of timely compensatory measures and corrective actions for adverse trends, and in sharing good practices and lessons learned	DOE O 226.1, Attachment 2, Appendix A, Section 7.	<p>PD-3200.004 Discussion Location: Page 7, Functional Program Page 15, Performance Metrics Page 23, Project Management</p> <p>Implementation Documents:</p> <ul style="list-style-type: none"> CD-3200.019, Quarterly Analysis Reporting OP-3200.030, Companywide Issue Tracking Data Processing PD-3200.003, Self-Assessment Program <p>Supplemental Discussion: See F&FI-2-2.1/4</p> <p>Issues: None</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F&FI-2-2.2	<p>Contractor Program Implementation Operating Experience: The Contractor has developed and implemented an Operating Experience program that communicates Effective Practices and Lessons Learned during work activities, process reviews, and incident/event analyses to potential users and applied to future work activities.</p>				
F&FI-2-2.2/1	Formal processes are in place to identify applicable lessons learned from external and internal sources and any necessary corrective and preventive actions, disseminate lessons learned to targeted audiences, and ensure that lessons learned are understood and applied.	DOE O 226.1, Attachment 2, Appendix A, Section 6.	<p>PD-3200.004 Discussion Location: Page 21, Lessons Learned</p> <p>Implementation Documents:</p> <ul style="list-style-type: none"> CD-3200.013, Lessons Learned Program OP-3200.005, Site Lessons Learned Coordinator PD-3200.003, Self-Assessment Program <p>Supplemental Discussion:</p> <ul style="list-style-type: none"> Improvements made to lessons learned program during fiscal year 05 made positive changes to the safety culture of the Nevada Test Site: Appointed 35 lessons learned coordinators who received, wrote, distributed lessons and return lessons learned feedback forms. Increased the number of lessons written to 67 in FY 05 from 30 written in fiscal year 04. Increased the number of feedback forms to over 1,600 in FY 05 from 250 in FY 04. Established mandatory requirement to write a lessons learned for any event that resulted in a Critique and any follow-on Root Cause Analysis. Senior Management committed to the communication of lessons learned, Occurrence Reports, Operational Experience Summaries, etc. with feedback documentation to the Lessons Learned Point of Contact. Work Management reviewed External and 	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
			<p>Internal lessons learned and incorporated appropriate lessons into their work packages.</p> <ul style="list-style-type: none"> Training Department incorporated appropriate information from lessons learned into their lesson plans, slides, student handouts, etc. <p>Issues: None</p>		
F&FI-2-2.2/2	<p>Line managers effectively identify and apply lessons learned.</p> <p>Line managers exchange lessons learned with the rest of the DOE complex</p> <p>Lessons learned identified by other DOE organizations and external sources are reviewed and applied by line management to prevent similar incidents/events.</p>	DOE O 226.1, Attachment 2, Appendix A, Section 6.	<p>PD-3200.004 Discussion Location: Page 21, Lessons Learned</p> <p>Implementation Documents:</p> <ul style="list-style-type: none"> CD-3200.013, Lessons Learned Program OP-3200.005, Site Lessons Learned Coordinator PD-3200.003, Self-Assessment Program <p>Supplemental Discussion: Refer to F&FI-2-2.2/1</p> <p>Issues: None</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F&FI-2-2.2/3	Formal programs and processes have been established and implemented to solicit feedback or suggestions from workers and work activities on the effectiveness of work definition, hazard analyses and controls, and implementation for all types of work activities, and to apply lessons learned.	DOE O 226.1, Attachment 2, Appendix A, Section 4	<p>PD-3200.004 Discussion Location: Page 14, Continuous Improvement Page 21, Lessons Learned, Page 24, Work Control</p> <p>Implementation Documents:</p> <ul style="list-style-type: none"> CD-3200.013, Lessons Learned Program CD-4000.003, Pre-Job Briefing and Post-Job Debriefings CM-0444.001-002, Environment, Safety, and Health Committees CM-0444.001-200, Organizational Interface for Worker Protection PD-3200.003, Self-Assessment Program <p>Supplemental Discussion: None</p> <p>Issues: DOE O 226.1, Attachment 2, Appendix A, Section 4 requires the implementation of processes to solicit feedback from workers and activities. Although this requirement is implemented in performance documents (<i>refer to CRADs F&FI-2-2.2/4</i>), PD-3200.004 does not contain a specific discussion of how BN meets this requirement.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F&FI-2-2.2/4	Employee concerns related to management of DOE and NNSA programs and facilities are promptly and thoroughly reported and investigated in accordance with applicable DOE directives.	DOE O 226.1, Attachment 2, Appendix A, Section 4	<p>PD-3200.004 Discussion Location: Page 20, Internal Audits Page 20, Employee Hotline</p> <p>Implementation Documents: PY-E300.001, Ethics and Business Conduct PY-E300.002, Internal Audit Policy OI-0444.004, Handling Safety Hotline Calls</p> <p>Supplemental Discussion: BN has implemented the Safety and Ethics Hotlines plus it responds to DOE inquiries initiated on the DOE Waste, Fraud, and Abuse Hotline.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
			Issues: None		
F&FI-2-2.3	Contractor Program Implementation <u>Event Reporting:</u> Contractor line management has established and implemented programs and processes to identify, investigate, report, and respond to operational events and incidents and occupational injuries and illnesses.				
F&FI-2-2.3/1	<p>Formal programs and processes have been established to identify issues and report, analyze, and address operational events, accidents, and injuries.</p> <p>Events, accidents, and injuries are promptly and thoroughly reported and investigated, including the identification and resolution of root causes and management and programmatic weaknesses, and distribution of lessons learned.</p>	DOE O 226.1, Attachment 2, Appendix A, Section 5	<p>PD-3200.004 Discussion Location: Page 18, Cause Analysis Page 18, Critiques Page 20, Issues Management Page 21, Lessons Learned Page 22, Occurrence Reporting and Notification Page 22, Price-Anderson Amendments Act</p> <p>Implementation Documents:</p> <ul style="list-style-type: none"> • CD-0400.002, Occurrence Reporting and Notification Process • CD-3200.007, Price-Anderson Amendments Act Process • CD-3200.008, Conduct of Critiques • CD-3200.009, Root Cause Analysis • CD-3200.013, Lessons Learned Program • CD-3200.017, Issue Reporting • CD-3200.018, Developing Corrective Action Plans • CD-4000.003, Pre-Job Briefing and Post-Job Debriefings • CM-0444.001-002, Environment, Safety, and Health Committees • CM-0444.001-007, Accident/Incident Notifying, Investigating, and Reporting • CM-0444.001-200, Organizational Interface for Worker Protection • OP-3200.005, Site Lessons Learned Coordinator • OP-3200.030, Companywide Issue Tracking Data Processing • PD-3200.003, Self-Assessment Program <p>Supplemental Discussion: The BN Occurrence Reporting program applies to all areas of BN performance including Subcontractor performance. The process starts with an event/incident that meets the reporting criteria of DOE M 231.1-2, <i>Occurrence Reporting and Processing of Operations Information</i>, this then initiates interaction with the companywide issue tracking system, critique/fact-finding, causal analysis, corrective action plans, lessons learned, trending, and potentially PAAA reporting processes. The BN Occurrence Reporting Administrator is an active participant in various aspects of these processes, provides support to NNSA/NSO and other NTS Tenant Organizations.</p> <p>Issues: None</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F&FI-2-2.3/2	Reporting of operational events, accidents, and injuries are conducted in accordance with applicable nuclear, security, environment, occupational safety and health, and quality assurance requirements, applicable DOE	DOE O 226.1, Attachment 2, Appendix A, Section 1.b.(2) and Appendix A,	<p>PD-3200.004 Discussion Location: Page 18, Cause Analysis Page 18, Critiques Page 20, Issues Management Page 21, Lessons Learned Page 22, Occurrence Reporting and Notification Page 22, Price-Anderson Amendments Act</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
	<p>directives, and contract terms and conditions.</p> <p>Trending analysis of events, accidents, and injuries are performed in accordance with structured/formal processes and applicable DOE directives.</p>	Section 3	<p>Implementation Documents:</p> <ul style="list-style-type: none"> CD-0400.002, Occurrence Reporting and Notification Process CD-3200.007, Price-Anderson Amendments Act Process CD-3200.008, Conduct of Critiques CD-3200.009, Root Cause Analysis CD-3200.013, Lessons Learned Program CD-3200.017, Issue Reporting CD-3200.018, Developing Corrective Action Plans CD-3200.019, Quarterly Analysis Reporting CD-4000.003, Pre-Job Briefing and Post-Job Debriefings CM-0444.001-002, Environment, Safety, and Health Committees CM-0444.001-007, Accident/Incident Notifying, Investigating, and Reporting CM-0444.001-200, Organizational Interface for Worker Protection OP-3200.005, Site Lessons Learned Coordinator OP-3200.030, Companywide Issue Tracking Data Processing PD-3200.003, Self-Assessment Program <p>Supplemental Discussion: BN Occurrence Reports are trended on a quarterly basis according to the guidelines established in DOE G231.1-1, <i>Occurrence Reporting and Performance Analysis Guide</i> and compared to the DOE complex for the same period.</p> <p>ES&H provides trending for safety related events/incidents.</p> <p>The Supplemental Information Tracking System (SITS) is currently under development.</p> <p>Issues: None</p>		
F&FI-2-2.4	<p>Contractor Program Implementation</p> <p><u>Issues Management:</u> The Contractor has developed and implemented a formal process to evaluate the quality and usefulness of feedback, and track to resolution performance and safety issues and associated corrective actions.</p>				
F&FI-2-2.4/1	<p>Program and performance deficiencies, regardless of their source, are captured in a system or systems that provides for effective analysis, resolution, and tracking. Issues management system elements include structured processes for:</p> <ul style="list-style-type: none"> Determination of risk, significance, and priority of deficiencies. Evaluation of scope and extent of condition. Determination of reportability under applicable requirements. Identification of root causes. 	DOE O 226.1, Attachment 2, Appendix A, Section 1.b.(4) and Appendix A, Section 5	<p>PD-3200.004 Discussion Location:</p> <p>Page 20, Issues Management Page 22 Occurrence Reporting and Notification Page 22, Price-Anderson Amendments Act Process Page 27, Tracking and Trending</p> <p>Implementation Documents:</p> <ul style="list-style-type: none"> CD-0400.002, Occurrence Reporting and Notification Process CD-3200.007, Price-Anderson Amendments Act Process CD-3200.008, Conduct of Critiques CD-3200.009, Root Cause Analysis CD-3200.017, Issue Reporting CD-3200.018, Developing Corrective Action Plans 	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
	<ul style="list-style-type: none"> • Identification and documentation of corrective actions and recurrence controls to prevent recurrence. • Identification of individuals/organizations responsible for corrective action implementation. • Establishment of milestones based on significance and risk for completion of corrective actions. • Tracking progress. • Verification of corrective action completion. • Validation of corrective action implementation and effectiveness. 		<ul style="list-style-type: none"> • CM-0444.001-007, Accident/Incident Notifying, Investigating, and Reporting • OP-OP-3200.030, Companywide Issue Tracking Data Processing • OP-3700.012, Corrective Action Plans for Security Infractions • PD-3200.003, Self-Assessment Program <p>Supplemental Discussion: None</p> <p>Issues: None</p>		
F&FI-2-2.4/2	Issues management processes include mechanisms to promptly identify the potential impact of a deficiency and take timely actions to address conditions of immediate concern, including stopping work, system shutdown, emergency response, reporting to management, and compensatory measures pending formal documentation and resolution of the issue.	DOE O 226.1, Attachment 2, Appendix A, Section 5.b.	<p>PD-3200.004 Discussion Location: Page 20, Issues Management Page 22 Occurrence Reporting and Notification Page 22, Price-Anderson Amendments Act Process Page 27, Tracking and Trending</p> <p>Implementation Documents:</p> <ul style="list-style-type: none"> • CD-0400.002, Occurrence Reporting and Notification Process • CD-3200.007, Price-Anderson Amendments Act Process • CD-3200.008, Conduct of Critiques • CD-3200.009, Root Cause Analysis • CD-3200.017, Issue Reporting • CD-3200.018, Developing Corrective Action Plans • CM-0444.001-007, Accident/Incident Notifying, Investigating, and Reporting • OP-OP-3200.030, Companywide Issue Tracking Data Processing • OP-3700.012, Corrective Action Plans for Security Infractions • PD-3200.003, Self-Assessment Program <p>Supplemental Discussion: None</p> <p>Issues: None</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F&FI-2-2.4/3	Processes for analyzing deficiencies, individually and collectively, have been established that enable the identification of programmatic or systemic issues. Line management effectively monitors progress and optimizes the allocation of assessment resources in addressing known systemic issues.	DOE O 226.1, Attachment 2, Appendix A, Section 5.c.	<p>PD-3200.004 Discussion Location: Page 20, Issues Management Page 22 Occurrence Reporting and Notification Page 22, Price-Anderson Amendments Act Process Page 27, Tracking and Trending</p> <p>Implementation Documents:</p> <ul style="list-style-type: none"> • CD-0400.002, Occurrence Reporting and Notification Process • CD-3200.007, Price-Anderson Amendments Act Process • CD-3200.008, Conduct of Critiques 	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
			<ul style="list-style-type: none"> CD-3200.009, Root Cause Analysis CD-3200.017, Issue Reporting CD-3200.018, Developing Corrective Action Plans CM-0444.001-007, Accident/Incident Notifying, Investigating, and Reporting OP-OP-3200.030, Companywide Issue Tracking Data Processing OP-3700.012, Corrective Action Plans for Security Infractions PD-3200.003, Self-Assessment Program <p>Supplemental Discussion: None</p> <p>Issues: None</p>		
F&FI-2-2.4/4	<p>Processes for communicating issues up the management chain to senior management have been established and based on a graded approach that considers hazards and risks.</p> <p>Line management receives periodic information on the status of identified deficiencies and corrective actions and holds organizations and individuals accountable for timely and effective completion of actions.</p> <p>Line management has executed graded mechanisms such as independent verification and performance-based evaluation to ensure that corrective action and recurrence controls are timely, complete, and effective.</p> <p>Closure of corrective actions and deficiencies are based on objective, technically sound, and verified evidence.</p> <p>The effectiveness of corrective actions is determined on a graded basis and additional actions are completed as necessary.</p>	DOE O 226.1, Attachment 2, Section 5.d.	<p>PD-3200.004 Discussion Location: Page 20, Issues Management Page 22 Occurrence Reporting and Notification Page 22, Price-Anderson Amendments Act Process Page 27, Tracking and Trending</p> <p>Implementation Documents:</p> <ul style="list-style-type: none"> CD-0400.002, Occurrence Reporting and Notification Process CD-3200.007, Price-Anderson Amendments Act Process CD-3200.008, Conduct of Critiques CD-3200.009, Root Cause Analysis CD-3200.017, Issue Reporting CD-3200.018, Developing Corrective Action Plans CM-0444.001-007, Accident/Incident Notifying, Investigating, and Reporting OP-OP-3200.030, Companywide Issue Tracking Data Processing OP-3700.012, Corrective Action Plans for Security Infractions PD-3200.003, Self-Assessment Program <p>Supplemental Discussion: None</p> <p>Issues: None</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F&FI-2-2.4/5	Results of various feedback systems are integrated and collectively analyzed to identify repeat occurrences, generic issues, trends, and vulnerabilities at a lower level before significant problems result.	DOE O 226.1, Attachment 2, Section 5.c.	<p>PD-3200.004 Discussion Location: Page 27, Tracking and Trending</p> <p>Implementation Documents:</p> <ul style="list-style-type: none"> CD-0400.002, Occurrence Reporting and Notification Process CD-3200.007, Price-Anderson Amendments Act Process CD-3200.009, Root Cause Analysis CD-3200.013, Lessons Learned Program CD-3200.017, Issue Reporting CD-3200.019, Quarterly Analysis Reporting 	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
			<ul style="list-style-type: none"> CM-0444.001-007, Accident/Incident Notifying, Investigating, and Reporting OP-3200.005, Site Lessons Learned Coordinator OP-3200.030, Companywide Issue Tracking Data Processing PD-3200.003, Self-Assessment Program <p>Supplemental Discussion: None</p> <p>Issues: None</p>		
F&FI-2-2.4/6	Individuals or teams responsible for corrective action development are trained in analysis techniques to evaluate significant problems using a structured methodology to identify root and contributing causes and corrective actions to prevent recurrence.	DOE O 226.1, Attachment 2, 2.e.	<p>PD-3200.004 Discussion Location: Specific discussion of this element is not provided in PD-3200.004. General discussion of training processes and training program for BN employees provided on Page 15, <u>Personnel Qualification and Training</u>.</p> <p>Implementation Documents:</p> <ul style="list-style-type: none"> CD-3200.008, Conduct of Critiques CD-3200.009, Root Cause Analysis OP-3200.007, Conduct of Critiques and Fact-Finding Meetings OP-3200.033, Root Cause Analysis OP-3200.035, Qualifying Critique Directors and Causal Analysts <p>Supplemental Discussion: None</p> <p>Issues: DOE O 226.1, Attachment 2, Section 2.e. requires that personnel who manage and perform assurance functions must possess experience, knowledge, skills, and abilities commensurate with their responsibilities. Although this requirement is implemented in performance documents (<i>refer to CRADs F&FI-1/6 and F&FI-2-2.4/6</i>), PD-3200.004 does not contain a specific discussion of how BN meets this requirement.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
FI-3	DOE Line Management Oversight: DOE line management have established and implemented effective oversight processes that evaluate the adequacy and effectiveness of contractor assurance systems and DOE oversight processes.				
F&I-3 Criteria 1	DOE line management has established a baseline line management oversight program that ensures that DOE line management maintains sufficient knowledge of site and contractor activities to make informed decisions concerning hazards, risks and resource allocation, provide direction to contractors, and evaluate contractor performance.	NV M 220.XC NV O 124.X	Annually, as part of the budgetary preparation, the contractor prepares the ES&H Management Plan. In the plan, hazards are identified and a risk ranking assigned. The NSO Executive Council reviews the information and determines the level of risk the organization is willing to accept. Finding: NSO has not scheduled and executed functional assessments in accordance with NSO M 220.XC, <i>NNSA/NSO Oversight Management</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
			System, dated 12-16-03.		
F&I-3 Criteria 2	DOE line oversight program includes assessments, operational awareness activities, performance monitoring and improvement, and assessment of contractor assurance systems. Documented program plans have been established that define oversight program activities and annual schedules of planned assessments and focus areas for operational awareness. Operational awareness activities must be documented either individually or in periodic (e.g., weekly or monthly) summaries. Deficiencies in programs or performance identified during operational awareness activities are communicated to the contractor for resolution through a structured issues management process.	NV M 220.XC	NSO has not scheduled and executed functional assessments in accordance with NSO M 220.XC, <i>NNSA/NSO Oversight Management System</i> , dated 12-16-03.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F&I-3 Criteria 3	DOE line management monitors contractor performance and assesses whether performance expectations are met; that contractors are assessing site activities adequately; self-identifying deficiencies; and, taking timely and effective corrective actions. Responsibilities for line oversight and self-assessment are assigned and managers, supervisors, and workers are held accountable for performance assurance activities. Deficiencies must be brought to the attention of contractor management and addressed in a timely manner.	NSO M 111.XE NV O 230.XA NV M 220.XC DOE O 226.1	Discussion: Finding and OFI identified in CDNS review. OFI: To institutionalize BN's Contractor Assurance System, NSO should capture the process within the NSO directives and include a provision for NSO personnel to negotiate and validate the performance metrics. OFI: The Quarterly Performance Indicator could be greatly enhanced by including accomplishments of FRs having a positive influence on operations.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F&I-3 Criteria 4	DOE line management requires that findings must be tracked and resolved through structured and formal processes, including provisions for review of corrective action plans.	NSO M 111.XE NV O 230.XA	Finding: NSO issues are not always effectively tracked and managed utilizing the site's issue management database (caWeb). Finding: caWeb is not being appropriately implemented for NSO quality assurance issues. OFI: NSO/BN should consider an assessment on the caWeb system to determine if improvements to root cause identification can be made to better determine root causes.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
F&I-3 Criteria 5	DOE line management regularly assess the effectiveness of contractor issues management and corrective action processes, lessons learned processes, and other feedback mechanisms (e.g., worker feedback). DOE line management must also evaluate contractor processes for communicating information, including dissenting opinions, up the management chain.	NSO M 111.XE NV O 230.XA	Issues: OFI: NSO does not have a program for dissenting opinions. Finding: NSO has not assessed the effectiveness of the contractors/NSO issues management system. Finding: NSO has not assessed the effectiveness of the contractor's lessons learned program and other feedback mechanisms. OFI: NSO has not assessed the effectiveness of the contractors/NSO issues management system, lessons learned program, and contractor assurance systems for WSI, SNJV, LANL, LLNL, and SNL.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F&I-3 Criteria 6	DOE line management must verify that corrective actions are complete and performed in accordance with requirements before findings identified by DOE assessments or reviews are closed, and requires that deficiencies are analyzed both individually and collectively to identify causes and prevent recurrences.	NSO M 111.XE NV O 230.XA NV M 220.XC	See Findings above. F&I-3, Criteria 3-5.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F&I-3 Criteria 7	DOE line management has established appropriate criteria for determining the effectiveness of site programs, management systems, and contractor assurance systems, and includes consideration of previous assessment results, effectiveness of corrective actions and self-assessments, and evidence of sustained management support for site programs and management and assurance systems. Review criteria are based on requirements and performance objectives (e.g., laws, regulations, DOE directives), site-specific procedures/manuals, and other contractually mandated requirements and performance objectives.	NSO M 111.XE NV O 230.XA NV M 220.XC DOE O 226.1	See Findings above. F&I-3, Criteria 1-3. OFI: To institutionalize BN's Contractor Assurance System, NSO should capture the process within the NSO directives and include a provision for NSO personnel to negotiate and validate the performance metrics.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F&I-3 Criteria 8	DOE line management has established and maintained appropriate qualification standards for personnel with oversight responsibilities, and a clear, unambiguous line of authority and responsibility for oversight.	NSO M 111 NV O 230.XA NV M 220.XC DOE O 226.1	Finding: Several key NSO positions have not been placed under the Technical Qualification Program (TQP) per DOE M 426.1-1A, <i>Federal Technical Capability Program Manual</i> . Finding: No NSO staff member is qualified under the internal (NSO) authorization basis (AB) qualification card, or the Nuclear Safety	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
			<p>Specialist TQP qualification card that is performing as a SBRT Team Leader.</p> <p>Finding: NSO has not developed a qualification package for the NSO Criticality Safety Functional Area Lead.</p> <p>Finding: Safety basis review engineers and quality assurance professionals have not completed requirements for technical qualifications.</p> <p>Finding: Although the current staffing may be adequate to perform the readiness role that NSO has taken on, a full implementation of oversight of the startup and restart of nuclear operations would appear to require the qualification and availability of other site personnel.</p> <p>Finding: The NNSA/NSO FRAM assigns Team Leaders responsibilities for ensuring training and qualification of personnel that is inconsistent with internal policies related to staffing, recruitment, hiring, and performance evaluation.</p> <p>OFI: NNSA/NSO personnel performing reviews of SB documentation and leading safety basis review teams have not completed qualification requirements.</p> <p>OFI: ORR Team Leaders requiring qualifications under the NNSA/NSO TQP program needs to be re-established and updated to reflect changes to the current organizational structure.</p> <p>OFI: STSM Qualification Cards should be tailored to accommodate site-specific hazards and activities.</p>		
F&I-3 Criteria 9	DOE Line management periodically reviews established performance measures to ensure performance objectives and criteria are challenging and focused on improving performance in known areas of weakness.	DOE O 226.1	See Findings above. F&I-3, Criteria 3.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F&I-3 Criteria 10	DOE line management has established effective processes for communicating line oversight results and other issues up the DOE line management chain, using a graded approach based on the hazards and risks. Established processes include provisions for communicating and documenting dissenting opinions. Formal structured processes for resolving	NSO M 111.XE NV M 220.XC DOE O 226.1	See F&I-3, Criteria 5	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Assessment Criteria					
#	Criterion	Source of Criterion	Discussion	Meets Criterion	
				Y	N
	disputes for oversight findings and other significant issues have been implemented, and include provisions for independent technical reviews for significant findings.				
F&I-3 Criteria 11	An effective employee concerns program been established and implemented in accordance with DOE Directives that encourages the reporting of employee concerns and provides thorough investigations and effective corrective actions and recurrence controls.	NSO M 111.XE NSO O 442.1B	NNSA/NSO has established an effective employee concerns program utilizing NSO O 442.1B. During recent OA reviews, employee concerns program was not assessed due to the fact the program appears to be operating efficiently.	<input checked="" type="checkbox"/>	<input type="checkbox"/>